

## **U.S. Department of Justice**

United States Attorney
Eastern District of New York

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June 14, 2018

Via Email

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Re: Kelley Amadei, et al. v. Kristjen Nielsen, et al.

Case No. 17-CV-5967 (E.D.N.Y.) (Garaufis, J.) (Scanlon, M.J.)

## Counselors:

Thus far, U.S. Customs and Border Protection ("CBP") has identified the following custodians who may have non-privileged documents responsive to Plaintiffs' Request for Production No. 16: (1) Francis Russo, Port Director, JFK Airport; (2) Marcellus Erdakos, Supervisory CBP Officer, JFK Airport; (3) Frank Gulin, Supervisory CBP Officer, JFK Airport; (4) Isabel Galantino, Assistant Port Director, JFK Airport; (5) Christian Schultz, CBP Officer, JFK Airport; (6) Rey Rivera Perez, CBP Officer, JFK; (7) Frank Umowski, Deputy Chief, JFK Airport; (8) Joseph Rollo, Chief, JFK Airport. CBP reserves the right to supplement this list of custodians as additional CBP documents are collected and reviewed.

Sincerely,

RICHARD P. DONOGUE United States Attorney

By: s/ Dara A. Olds

DARA A. OLDS

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